

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

Motion Picture Association of America, Inc.)	
)	
v.)	Case No. 02-1033
)	
Petitioner,)	
)	
The Register of Copyrights, <i>et al.</i>)	
)	
Respondents.)	

<i>Consolidated With</i>)	
)	
)	
Independent Producers Group, <i>et al.</i>)	
)	
v.)	Case No. 02-1040
)	
Petitioner,)	
)	
The Librarian of Congress, <i>et al.</i>)	
)	
Respondents.)	

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL

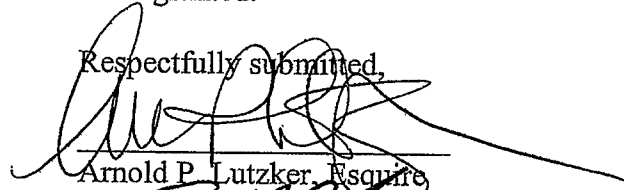
Undersigned counsel for Independent Producers Group and Independent Producers Group Represented Program Suppliers ("IPG"), Arnold P. Lutzker and Carl H. Settlemyer, III of Lutzker & Lutzker LLP ("L&L"), respectfully move this Court for leave to withdraw their appearance as counsel for IPG. L&L has sought, but has not secured, IPG's consent to the instant motion.

The undersigned hereby certify that they have served a copy of the instant Motion on IPG at the addresses shown in the Certificate of Service attached hereto. They further certify that they have given IPG notice advising it to retain other counsel, have notified


IPG of their intention to file the instant Motion and advised IPG to obtain other counsel, or, if IPG intends to conduct the case pro se or to object to the withdrawal, to so notify the Clerk in writing within five days of service of the instant Motion.

The undersigned aver that the requested withdrawal would not occasion any undue delay, be unfairly prejudicial to any party, or otherwise not be in the interests of justice. In particular, the undersigned aver that the briefing schedule on the above-captioned appeals has been suspended so that settlement discussions may proceed. Accordingly, the undersigned's withdrawal as counsel for IPG can be effected without material prejudice to IPG, and should therefore be granted.

Respectfully submitted,



Arnold P. Lutzker, Esquire


Carl H. Settlemyer, III, Esquire

LUTZKER & LUTZKER LLP
Suite 450
1000 Vermont Avenue, N.W.
Washington, D.C. 20005
Phone: 202-408-7600
Fax: 202-408-7677

January 17, 2003

Attorneys for Independent Producers Group
And Independent Producers Group
Represented Program Suppliers

CERTIFICATE OF SERVICE

I, Carl H. Settlemyer, hereby certify that I have caused copies of the foregoing **Motion for Leave to Withdraw As Counsel** to be sent via first-class, postage pre-paid mail, this 17th day of January, 2003, to the following:

Anne Murphy, Esquire
William Kanter, Esquire
United States Department of Justice
Civil Division, Appellate Staff
601 D Street, N.W., Room 9547
Washington, D.C. 20530

Elizabeth Pugh
General Counsel, Library of Congress
James Madison Building
Room 601
101 Independence Avenue, S.E.
Washington, D.C. 20540

The Honorable Marybeth Peters
Register of Copyrights
James Madison Building
Room 403
101 Independence Avenue, S.E.
Washington, D.C. 20540

David Carson
General Counsel, Copyright Office
James Madison Building
Room 403
101 Independence Avenue, S.E.
Washington, D.C. 20540

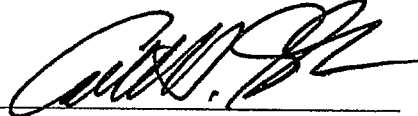
Michael E. Tucci, Esquire
Gregory O. Olaniran, Esquire
MORRISON & HECKER, L.L.P.
1150 18th Street, N.W.
Suite 800
Washington, DC 20036-3816

Marian Oshita
Independent Producer's Group
9903 Santa Monica Boulevard #655
Beverly Hills, CA 90212

And by facsimile to: 310-446-9978

Lisa Katona Galaz
Independent Producers Group
2318 Sawgrass Ridge
San Antonio, TX 78258

And by facsimile to: 830-438-8882



Carl H. Settlemyer